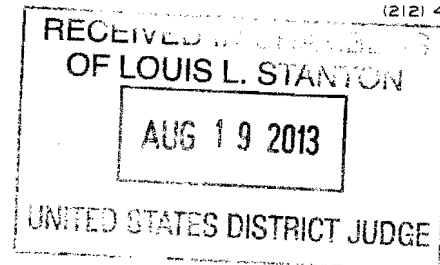


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August 16, 2013



BY HAND DELIVERY

The Honorable Louis L. Stanton
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Ronard Lora, et al., v. J.V. Car Wash, Ltd., et al., No. 11-CV-9010 (LLS)

Dear Judge Stanton:

We represent the Plaintiffs Ronard Lora, Hugo Rivera, Marcos Antonio Diaz, Melvin Lora, Eduardo Lora, Giovanni Paulino, Jose Rodriguez and Jose Rodolfo Rodriguez-Tineo, together with ten other opt-in plaintiffs (the "Plaintiffs") in the above-referenced action (the "FLSA Action").

This FLSA Action is currently on the Court's trial calendar for September 9, 2013, with Plaintiffs' version of the draft pre-trial order due to be submitted to Defendants on August 19, 2013; Defendants' response due to be submitted to Plaintiffs on August 30, 2013; and all final pre-trial materials, including the joint pre-trial order, due to be submitted to chambers on September 4, 2013, at noon.

I am saddened to advise the Court that the ninety-year-old mother of my colleague, Steven Arenson, Esq., was suddenly taken ill on July 31, 2013, and was admitted to the intensive care cardiac unit at Mt. Sinai Hospital. She remained there in extremely critical condition until her death on Wednesday, August 14, 2013. Mr. Arenson has spent most of the last sixteen days with his mother in the hospital, or with other family members making arrangements for the funeral, which was yesterday. He will continue to be out of the office for at least another week.

Mr. Arenson's active participation in our pre-trial preparations is essential to our presentation of this FLSA Action. I have been endeavoring to comply with the Court's schedule for pre-trial matters on this matter, but Mr. Arenson's understandable absence from the office during this period is making it extremely difficult for me to do so. Additionally, Mr. Arenson and I have been friends since our days as co-clerks in the Eastern District of New York, more than twenty-five years ago. His loss also has affected me personally.

In light of these extraordinary circumstances, which certainly were not foreseeable as of the Court's July 12, 2013 Order re-scheduling the trial date in this matter, we respectfully request that the September 9, 2013 trial date be adjourned. I have consulted with Louis J. Maione, Esq., counsel for the Defendants, who has consented to this request for an extension of the trial date.

Based on other commitments of the parties in September (which include the Jewish holidays) and October, and in consultation with Mr. Maione concerning his calendar, we request

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that the trial date be adjourned to Tuesday, November 12, 2013,¹ at 10:30 a.m., and that the other dates be re-scheduled as follows, subject to the Court's approval:

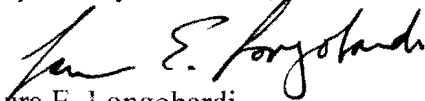
On or before Monday, October 21, 2013, Plaintiffs shall submit to Defendants a draft pre-trial order;

On or before Friday, November 1, 2013, Defendants shall respond to Plaintiffs' pre-trial order in accordance with Rule 3(A)(2) of the Court's individual practices; and

On or before Wednesday, November 6, 2013, at noon, the parties shall submit to chambers a joint pre-trial order, proposed voir dire questions, proposed jury charges, trial briefs and proposed verdict forms.

I thank the Court for its consideration of this request at this difficult time.

Respectfully submitted,


Laura E. Longobardi

LEL:

cc: Louis J. Maione, Esq. (by electronic mail)

*Final Pretrial
Conf Friday Nov
8, 2013 at
12:30 PM*

*So
Ordered
Louis L
Stanton
8/20/13*

¹ Monday, November 11, 2013, is Veteran's Day; otherwise I would have suggested that date as the adjourned trial date.